

March 25, 2014

Maximilian Halm (Complainant)

La Salle, IL 61301

Randall Olsen (Respondent)

Randall Olsen for Congress

PO Box 66

Ottawa, IL 61350

MUR # 6804

FEC Complaints Division:

I, Maximilian Halm, , La Salle, IL 61301, file this complaint against Randall Olsen and Randall Olsen for Congress, PO Box 66, Ottawa, IL 61350.

Facts at Issue:

Mr. Randall Olsen announced his candidacy for Illinois' 16th Congressional District on August 16, 2013 and filed his "statement of candidacy" with the Federal Elections Commission (FEC) on September 3, 2013 for the office of United State Representative for Illinois' 16th Congressional District. Since announcing his candidacy, Mr. Olsen has actively campaigned for the office he seeks. During that time, the campaign committee, Randall Olsen for Congress, (The Committee) has incurred expenses, including but not limited to, travel expenses, campaign materials including yard signs and flyers, printing expenses and expenses for the construction of The Committee's website [www.electrandalolsen.com](http://www.electrandalolsen.com). The Committee incurs monthly expenses from "Nation Builder" for hosting the content on [www.electrandalolsen.com](http://www.electrandalolsen.com).

Since announcing his candidacy, Randall Olsen has actively sought political contributions for the purpose of financing his campaign. Mr. Olsen has held or will be holding multiple fundraisers with donations designated to The Committee. Mr. Olson has held fundraisers on the following days:

- February 27, 2014;
- March 6, 2014;
- March 11, 2014;
- March 13, 2014.

Lastly, The Committee has purchased ad space for the purpose of distributing as a public communication to customers of North Pharmacy, Loves Park, IL.

Rules at Issue:

- 11 CFR § 100.26
- 11 CFR § 100.3
- 11 CFR § 104.1

- 11 CFR § 110.11

### **Application of the Law to the Facts**

Under 11 CFR § 100.3 an individual seeking office becomes a candidate when that individual received \$5,000.00 in campaign contributions or has made campaign expenditures in the aggregate of \$5,000.00. A principle campaign committee becomes a political committee when that individual becomes a candidate pursuant to 11 CFR § 100.3. In accordance with 11 CFR § 100.3 a candidate and his authorized committee must file complete and accurate reports on time with the FEC.

Randall Olsen has credibly aggregated \$5,000.00 in campaign contributions. Since announcing his candidacy in August of 2013, Mr. Olsen has had 7 months to raise funds for The Committee. In addition, Mr. Olsen has held 4 fundraisers in the last month alone. Since announcing his candidacy, The Committee has failed to file the October Quarterly, Year-End, and pre-primary reports with the FEC in violation of 11 CFR § 104.1.

In the alternative, Randall Olsen has credibly aggregated \$5,000.00 in campaign expenditures with travel expenses, website construction, website design, website content hosting fees, the opening of a campaign PO Box, campaign materials, and printing costs for nominating petitions, campaign literature, campaign ads on prescription pharmacy bags and campaign yard signs. Despite credibly incurring over \$5,000.00 in campaign expenditures, The Committee has failed to file an October Quarterly, Year-End, and Pre-Primary reports with the FEC in violation of 11 CFR § 104.1.

Under 11 CFR § 110.11(a) all public communications, as defined in 11 CFR 100.26, made by a political committee, must include disclaimers. Under 11 CFR § 110.11(b) (1) communications require a disclaimer indicating that a principle political committee paid for the communication. Under 11 CFR § 110.11(c) (2) (ii) printed communications require a disclaimers must be contained in a printed box. Randall Olsen's yard signs are intended to provide a communication regarding his candidacy for Illinois' 16th Congressional District. Randall Olsen's yard signs do not contain a disclaimer in a preprinted box in violation of 11 CFR § 110.11(c) (2) (ii). In addition, Randall Olsen's ad on prescription bags (attached) at North Park Pharmacy in Loves Park does not include a political disclaimer. In the alternative, if The Committee did not buy this ad space then it was an in-kind contribution from North Park Pharmacy which The Committee failed to report by failing to file any report with the FEC since Randall Olsen filed his statement of candidacy.

Lastly, Randall Olsen's flyer (attached) is intended to communicate & advocate for the election of Randall Olsen. Under 11 CFR § 110.11(c) (2) (ii) printed communications require a disclaimers must be contained in a printed box. This flyer in question does not contain a disclaimer in a pre printed box in violation of 11 CFR § 110.11(c) (2) (ii).

Respectfully,

*Margaret F. Helms*

Name

Sworn to and subscribed before me this 26 day of Jan 2014.


*Joann Corrigan*



11005101010101




**Randall  
OLSEN**  
**FOR CONGRESS**  
Democratic candidate for the  
16th District of Illinois



**SUPPORT**

- / Promoting support and care for our veterans
- / Reforming our education system
- / Cap and Trade for a cleaner environment
- / Immigration reform
- / Protecting our military
- / Workers' Rights
- / Job creation and economic opportunity for all
- / Restoring the right of all citizens to vote

**Randall  
OLSEN**



Born in Chicago's South Side to blue collar parents, and educated in the public school system in Chicago, Illinois. After a four year period of military duty, earned college by taking classes part time while serving in the military. Served in the Air Force from 1968 until 1974 as an Army Aviator and Navigator. After leaving the service, worked as a Nuclear and Nuclear Engineering Technician.

Learn more at  
**www.electrolsen.com**

Find out how you can help elect Randall Olsen



**Randall Olsen for Congress - Illinois  
16th**

Like This Page · November 8, 2013

New flyer for Randall Olsen for Congress - Illinois 16th

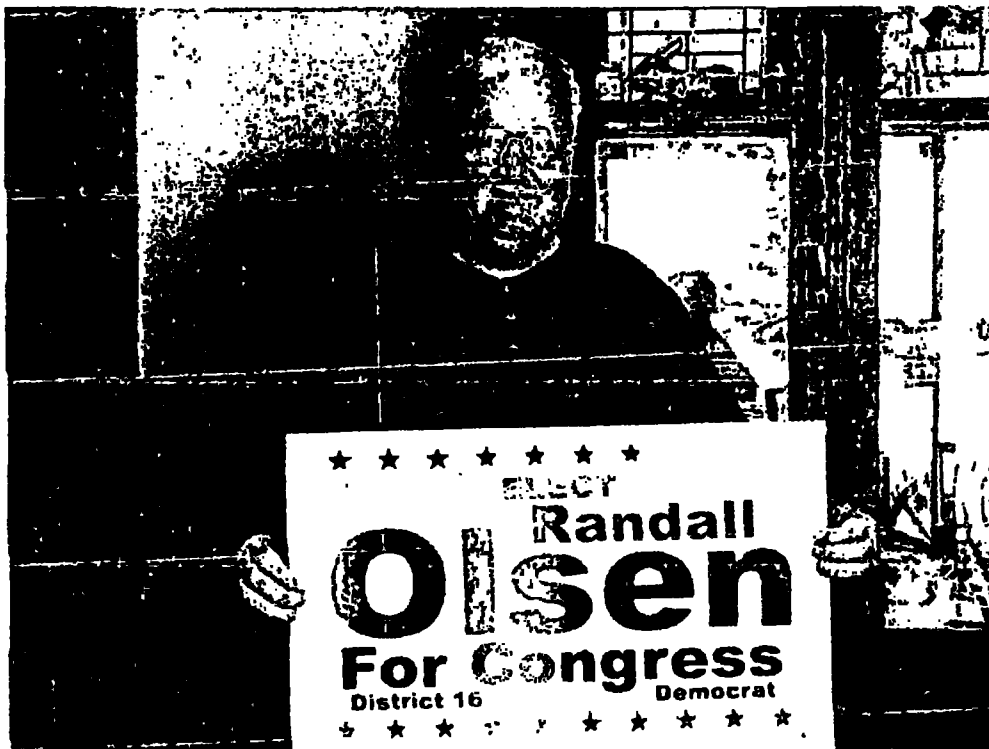
Like · Comment · Share



**John Stavers** Does Mr. Olson have an opponent?

Like · Reply · November 8, 2013 at 9:23pm

John Quilbo QR code. Noel



**Randall Olsen**  
Follow · March 15

I feel like Steve Martin in "The Jerk," yell: phone books are here! The new phone books are here! The new political yard signs are here!"

Like · Share

35 people like this.

3 shares

View 24 more comments

Don Leopold We can get your signs So, Ottawa Twp.  
March 15 at 7:39pm · Like



Dan Davis Good Luck In your Elect! Sorry can't vote in your favor! Hope you'll be a Great Congressman!  
March 15 at 8:37pm · Like



Randall Olsen No prob Dan, You ar district so no guilt for you. Thanks if wished though.  
March 15 at 8:42pm · Like · 1



Pat Arwood Kotowski I'll be back h few weeks and am willing to help or can  
March 15 at 10:34pm · Like



Barb Mann Id like one for the west  
March 15 at 10:36pm · Like



Mary R Hall Good luck to you Rand totally see you holding a position in

